

PLAINTIFF'S PROPOSED SPECIAL QUESTIONS TO JURY

SHEHATOU v. GOBEL AND HOPKINS

QUESTION #1

Was the defendant, John Gobel, negligent in the operation of the motor vehicle he was driving on May 21, 2003 in Pittsfield, Massachusetts?

Yes_____, No_____

(PLEASE CHECK ONE)

Please proceed to Question #2.

QUESTION #2

Was the defendant, Jay Hopkins, negligent in the operation of the motor vehicle he was driving on May 21, 2003 in Pittsfield, Massachusetts?

Yes_____, No_____

(PLEASE CHECK ONE)

If you answered either Question #1 or #2 "YES" please proceed to Question #3. If you answered both "NO", your deliberations are complete.

QUESTION #3

Was the negligence of John Gobel a substantial cause, in whole or in part, of any injury and damage sustained by the plaintiff, Teriza Shehatou?

Yes_____, No_____

(PLEASE CHECK ONE)

Please proceed to Question #4.

QUESTION #4

Was the negligence of Jay Hopkins a substantial cause, in whole or in part, of any injury and damage sustained by the plaintiff, Teriza Shehatou?

Yes_____, No_____

(PLEASE CHECK ONE)

If your answer to either or both of Questions #3 or #4 was "YES," please proceed to Question #5. If your answer to both Questions #3 and #4 were "NO," your deliberations are complete.

QUESTION #5

What sum of money will reasonably compensate Teriza Shehatou for the injuries and damages sustained by her?

(Please use words in answering Question #5. Do not use numerals)

CSD:MGR